

See note: Who Fills out the EAR? u

Enforcement Action Referral Rev. 3/18/2002	Inv. #	1577738	Initiated by: Region, LP, Central:	Region
	Enf Case		Name of Initiating Office:	REGION 02 - LUBBOCK
	Media Code:	IHWHL MSW		

Section 1: Respondent

ID	CN605670983		Role	RESP PARTY
Name	CHRISTOPHER WATERS			
Mailing Address	Street/PO Box	9207 FLINT AVE		
	City/State/Zip	LUBBOCK, TX 79423		
	Phone	(432) 413-5463	Fax	

Primary Contact (NOE Contact)			
Name	CHRISTOPHER WATERS	Organization	BULLDOG ENVIRONMENTAL SERVICES
Title	Owner	Phone	(432) 413-5463
		Fax	

Section 2: Respondent's Facility/Operation (F/O)

F/O ID	RN110797057		
F/O Name	BULLDOG ENVIRONMENTAL ANTON UNA SITE		
F/O Physical Address	213 N MAIN ST		
Location City	ANTON	Location Zip	79313
Location County	HOCKLEY	Operational Status	Active
Primary Business Activity	Environmental Clean-ups	Type of Small Entity	Small Business
SNC or HPV?	SNC	SIC Code	
Potentially Affected Area	HUMAN HEALTH AND THE ENVIRONMENT	Complaints Closed	1
List any NOV's? Orders for same or similar violations at this F/O in the past 5 years.			
Additional IDs	455020064		

Section 3: Summary of Violations

See note: Inclusion of Resolved or Verbal Violations u

Information Copy to CFR MC 218 7/22/19 ah
 Original EAR to MC 128 7/19/19 ah
 Enforcement Copy to MC 128 7/19/19 ah

Viol Num	Requirements Cited Violation Description	Violation Dates		Investigation/ File Review	Date of...		CAT
		Start	End		NOV	NOE	
719928	30 TAC Chapter 335.2(a)	04/25/2019	Unknown	04/25/2019		07/19/2019	A
	30 TAC Chapter 335.4	04/25/2019	Unknown	04/25/2019		07/19/2019	A
	Failure to obtain a permit prior to the storage of industrial and hazardous solid waste or municipal hazardous waste.						
719932	30 TAC Chapter 335.15	04/25/2019	Unknown	04/25/2019		07/19/2019	B
	Failure to comply with recordkeeping and reporting requirements.						
719935	30 TAC Chapter 335.92	04/25/2019	Unknown	04/25/2019		07/19/2019	A
	Failure to have an EPA identification number and authorization prior to transporting hazardous and Class I waste.						
719941	30 TAC Chapter 335.10	04/25/2019	Unknown	04/25/2019		07/19/2019	B
	30 TAC Chapter 335.11	04/25/2019	Unknown	04/25/2019		07/19/2019	B
	Failure to comply with manifesting requirements.						
719943	30 TAC Chapter 330.15(a)	04/25/2019	Unknown	04/25/2019		07/19/2019	A
	30 TAC Chapter 330.7(a)	04/25/2019	Unknown	04/25/2019		07/19/2019	A
	Failure to have an authorization prior to storing solid waste at an unauthorized transfer station.						
719955	30 TAC Chapter 330.15(c)	04/25/2019	Unknown	04/25/2019		07/19/2019	B
	TWC Chapter 26.121	04/25/2019	Unknown	04/25/2019		07/19/2019	B
	Failure to prevent the discharge of an unknown waste substance onto the ground. The soil was stained and vegetation damaged. There was a strong chemical/acid odor in the immediate areas of the discharge.						
719964	30 TAC Chapter 324.4	04/25/2019	Unknown	04/25/2019		07/19/2019	A
	Failure to obtain a used oil transporter and storage registration prior to conducting such activities.						

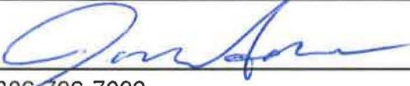
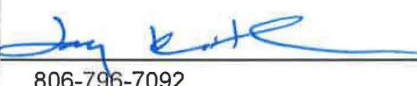
Section 4: Additional Discussion

The alleged violations are being referred to the TCEQ Enforcement Division per the Enforcement Initiation Criteria (EIC) Revision 16, effective date December 13, 2018, multiple violations are category A violations per the EIC.

Section 5: Additional Issues

N/A

Section 6: Information About Initiating Office

	Name	Jason Adams	Date	7/19/19
	Signature			E-Mail Jason.Adams@tceq.texas.gov
	Phone	806-796-7092		
	Name	Jay Keith	Date	7/19/2019
	Signature			E-Mail Jay.Keith@tceq.texas.gov
	Phone	806-796-7092		

COMP CG_HOCKLEY_CP_20190525_INVESTIGATION
Texas Commission on Environmental Quality
Investigation Report

The TCEQ is committed to accessibility. If you need assistance in accessing this document, please contact oce@tceq.texas.gov

Customer: WATERS, CHRISTOPHER
Customer Number: CN605670983

Regulated Entity Name: BULLDOG ENVIRONMENTAL ANTON UNA SITE

Regulated Entity Number: RN110797057

Investigation # 1577738

Incident Numbers

306964

Investigator: JASON ADAMS

Site Classification STORAGE

Conducted: 04/25/2019 -- 05/25/2019

No Industry Code Assigned

Program(s): INDUSTRIAL AND HAZARDOUS WASTE
MUNICIPAL SOLID WASTE NON PERMITTED

Investigation Type: Compliance Investigation

Location:

Additional ID(s): 455020064

Address: 213 N MAIN ST,
ANTON, TX , 79313

Local Unit: REGION 02 - LUBBOCK

Activity Type(s): IHWCMPL - Complaint investigation
MSWUNA - Investigation at a site that
is in violation of 330.7, including
illegal disposal of tires

Principal(s):

Role	Name
RESPONDENT	CHRISTOPHER WATERS

Contact(s):

Role	Title	Name	Phone
PARTICIPATED IN	OWNER	MR CHRISTOPHER WATERS	Work (432) 413-5463
REGULATED ENTITY MAIL CONTACT	OWNER	MR CHRISTOPHER WATERS	Work (432) 413-5463
REGULATED ENTITY CONTACT	OWNER	MR CHRISTOPHER WATERS	Work (432) 413-5463

Other Staff Member(s):

Role	Name
Supervisor	JAY KEITH
QA Reviewer	SARA COLEY
Investigator	SARA COLEY

BULLDOG ENVIRONMENTAL ANTON UNA SITE - ANTON

4/25/2019 to 5/25/2019 Inv. # - 1577738

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Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
MSW GENERIC OTHER ISSUES OR VIOLATIONS	BULLDOG
IHW COMPLAINT	BULLDOG

Investigation Comments:

INTRODUCTION

On April 23, 2019, an anonymous complaint was received by the Lubbock Region 2 office via phone. The complainant alleged Bulldog Environmental Services was storing potassium cyanide from spill clean-ups inappropriately. The alleged storage facility is located at 213 Main Street, Anton, Hockley County, TX (see aerial images attached). On April 25-May 25, 2019, the complaint was investigated. Mr. Jason Adams and Ms. Sara Coley, Environmental Investigators with the Texas Commission on Environmental Quality (TCEQ), conducted the investigation.

BACKGROUND

There have been no Industrial and Hazardous Waste (IHW) or Municipal Solid Waste (MSW) investigations conducted at the RE in the past 5 years.

GENERAL FACILITY AND PROCESS INFORMATION

The location is surrounded by commercial businesses and residences. It is located within a half mile of the Anton School. Mr. Christopher Waters owns Bulldog Environmental Services LLC, which is an environmental clean-up company. According to the company's website, they do various clean-up activities for Texas Railroad Commission (RRC) regulated sites, spills and releases from accidents covered by the TCEQ, and bioremediation on-site for petroleum releases.

ADDITIONAL INFORMATION

During the investigation, the investigators observed the building and area behind the building were not secured. The front door of the building had an unlocked screen door to the main street. The rear overhead door was missing, and the side doors were not locked (see photos 1 & 2). The building was missing the roof, exposing the containers in the building to the elements. The investigators observed approximately 248 (30 & 55-gallon drums), 51 chemical totes, 4 yellow overpack containers, and 2 poly tanks being stored inside the building (see photos 3-19). Numerous 55-gallon drums were showing signs of distress from bulging on the top and bottoms of the drums (see photos 3-5, 7, 9, 12-14, 16, 18, 19). It is unknown what the waste contents of the containers in the building are. At least 2 drums had the tops corroded off and fallen into the drum exposing the solid waste being stored inside in violation of 30 TAC §33.7(a) & §330.15(a). The drums may not be compatible with the waste stored inside.

A majority of the chemical totes were observed to be empty however 5-6 appeared to have an unknown waste material stored inside. The overpacks appeared to contain some unknown waste. The drums, totes, overpacks, and poly tanks were not sampled due to safety concerns of the unknown contents and the bulging of the drums. Many of the bulging drums had paint residue on the outside of the lid and sides. One of the drums had a faded label that claimed it to be universal paint and paint related waste which would indicate the waste to be hazardous in violation of 30 Texas Administrative Code (TAC) §335.2(a) & §335.4. One of the drums was labeled Methanol. There was no other labeling on the other drums to definitively identify the contents. There was a paint and solvent odor within the area of the building where the bulging drums and totes were being stored. The drums were expanding at the time of the investigation. Loud pings could be heard coming from the drums as they heated in the sun. Bags of lime and absorbent socks were also observed in the building area. These were not protected from the elements. Some of the bags were torn open and the contents were scattered on the ground surrounding the bags and absorbent socks.

The area behind the building across the alley to the west is being used by the RE. There was a large concrete pad observed to have a release of some waste substance (see photos 20-31). It appeared at least one of the totes had been rinsed out on the pad and allowed to discharge onto the concrete pad and surrounding soil on the southwest and west side of the concrete pad in violation of 30 TAC §330.15(c) & §26.121(see photos 22-28). The discharge of waste onto the ground ran off the concrete pad along the south side of the two storage buildings and along the west side of the storage building doors. A very strong odor of acid and/or chemical was noted in this area. Absorbent was observed in this area scattered on the concrete pad and surrounding soil (see photos 22-27). A pile of absorbent with staining was also observed on the concrete pad (see photo 22). There are 8 chemical totes in the

BULLDOG ENVIRONMENTAL ANTON UNA SITE - ANTON

4/25/2019 to 5/25/2019 Inv. # - 1577738

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area either on the concrete pad or to the edge on the soil. Four of these totes contain some type of waste material which appears to be used oil in violation of 30 TAC §324.4.

The investigators observed approximately 100 chemical totes were being stored northwest of the concrete pad (see photos 32 & 33). It is unknown if all of these totes are empty by definition. On the south end of the totes was one tote that was approximately $\frac{3}{4}$ full of an unknown waste (see photo 34). There are 4 galvanized tubs that contained water and some sort of algae growth (see photo 34 -37). It is unknown if these containers have a sealed bottom or if there is bare ground on the bottom of the tubs. There is one black plastic container that has an oily sheen on the top of the waste fluid (see photo 38). There were no lids present on the four tubs or black container. These are open to the elements and rainfall could cause the containers to overflow onto the ground. The investigators observed numerous 55-gallon drums being stored unsecured in the elements between the two storage buildings and the totes. It appeared that the drums had the lids secured except for one drum with no lid. This drum appeared to have some type of waste oil in it. None of the drums were labeled as to their contents. One overpack was observed in this area and appeared to contain some type of waste. No sampling was conducted due to safety concerns of what unknown waste was discharged on the ground with such a strong chemical/acid odor.

On April 25, 2019, Mr. Waters was contacted concerning the complaint and the waste material being stored on-site (see Secretary of State printout). Mr. Waters stated that he had collected the wastes from clean-up activities on roadways, RRC spills, and paint and paint related wastes from local manufacturers. Transporting as hazardous waste, even handled as a universal waste, requires a transporter authorization. Conducting this activity without authorization is a violation of 30 TAC §335.92. Mr. Waters stated that he did not have any paperwork (ie. manifests, waste determinations, work orders or disposal receipts) for the waste containers being stored at the RE in violation of 30 TAC §335.15, §335.10 and §335.11.

Mr. Waters was given contact information for the TCEQ Lubbock Region office, and stated he would contact the Lubbock Region office when he arrived back into town from a trip. Mr. Adams attempted to contact Mr. Waters on May 21 and May 24, 2019. Mr. Waters has not contacted the Lubbock Region office since the original conversation via phone on April 25, 2019. On July 17, 2019, an Exit Interview Form with the above identified alleged violations was emailed to Mr. Waters. A Notice of Enforcement letter was sent to the RE in July 2019.

NOE Date: 7/19/2019

**OUTSTANDING ALLEGED VIOLATION(S)
ASSOCIATED TO A NOTICE OF ENFORCEMENT**

Track Number: 719928

Compliance Due Date: To Be Determined

Violation Start Date: 4/25/2019

**30 TAC Chapter 335.2(a)
30 TAC Chapter 335.4**

Alleged Violation:

Investigation: 1577738

Comment Date: 07/12/2019

Failure to obtain a permit prior to the storage of industrial and hazardous solid waste or municipal hazardous waste.

Recommended Corrective Action: The RE must remove all hazardous and non-hazardous waste from the unauthorized site and dispose of it at an authorized facility. Documentation of corrective action must be submitted to the TCEQ.

Track Number: 719932

Compliance Due Date: To Be Determined

Violation Start Date: 4/25/2019

BULLDOG ENVIRONMENTAL ANTON UNA SITE - ANTON

4/25/2019 to 5/25/2019 Inv. # - 1577738

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30 TAC Chapter 335.15

Alleged Violation:

Investigation: 1577738

Comment Date: 07/19/2019

Failure to comply with recordkeeping and reporting requirements. Mr. Waters stated that he had no paperwork for the wastes being stored at the RE.

Recommended Corrective Action: The RE must maintain records for all hazardous and non-hazardous waste at the unauthorized site. Documentation of corrective action must be submitted to the TCEQ.

Track Number: 719935

Compliance Due Date: To Be Determined

Violation Start Date: 4/25/2019

30 TAC Chapter 335.92

Alleged Violation:

Investigation: 1577738

Comment Date: 07/12/2019

Failure to have an EPA identification number and authorization prior to transporting hazardous and Class I waste.

Recommended Corrective Action: The RE must have an EPA identification number and authorization prior to transporting hazardous and Class I waste. Documentation of corrective action must be submitted to the TCEQ.

Track Number: 719941

Compliance Due Date: To Be Determined

Violation Start Date: 4/25/2019

30 TAC Chapter 335.10

30 TAC Chapter 335.11

Alleged Violation:

Investigation: 1577738

Comment Date: 07/19/2019

Failure to comply with manifesting requirements. Mr. Waters stated that he had no manifests for the wastes being stored at the RE.

Recommended Corrective Action: The RE must comply with manifesting requirements. Documentation of corrective action must be submitted to the TCEQ.

Track Number: 719943

Compliance Due Date: To Be Determined

Violation Start Date: 4/25/2019

30 TAC Chapter 330.15(a)

30 TAC Chapter 330.7(a)

Alleged Violation:

BULLDOG ENVIRONMENTAL ANTON UNA SITE - ANTON

4/25/2019 to 5/25/2019 Inv. # - 1577738

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Attachments: (in order of final report submittal)

☒ Enforcement Action Request (EAR)

☒ Letter to Facility (specify type) : NDE

Investigation Report

☐ Sample Analysis Results

☐ Manifests

☐ Notice of Registration

☒ Maps, Plans, Sketches

☒ Photographs

☐ Correspondence from the facility

☒ Other (specify) :

EIF, SOS

BULLDOG ENVIRONMENTAL ANTON UNA SITE - ANTON

4/25/2019 to 5/25/2019 Inv. # - 1577738

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Investigation: 1577738

Comment Date: 07/12/2019

Failure to have an authorization prior to storing solid waste at an unauthorized transfer station.

Recommended Corrective Action: The RE must remove all solid waste from the unauthorized site and dispose of it at an authorized facility. Documentation of corrective action must be submitted to the TCEQ.

Track Number: 719955

Compliance Due Date: To Be Determined

Violation Start Date: 4/25/2019

30 TAC Chapter 330.15(c)
TWC Chapter 26.121

Alleged Violation:

Investigation: 1577738

Comment Date: 07/12/2019

Failure to prevent the discharge of an unknown waste substance onto the ground. The soil was stained and vegetation damaged. There was a strong chemical/acid odor in the immediate areas of the discharge.

Recommended Corrective Action: The RE must clean-up the discharged unknown waste substance from the concrete pad and surrounding soil areas. Documentation of corrective action must be submitted to the TCEQ.

Track Number: 719964

Compliance Due Date: To Be Determined

Violation Start Date: 4/25/2019

30 TAC Chapter 324.4

Alleged Violation:

Investigation: 1577738

Comment Date: 07/19/2019

Failure to obtain a used oil transporter and storage registration prior to conducting such activities.

Recommended Corrective Action: The RE must obtain a used oil transporter and storage registration prior to conducting such activities. All unauthorized storage of used oil must be disposed of or recycled at an authorized disposal/recycling facility. Documentation of corrective action must be submitted to the TCEQ.

Signed


Environmental Investigator

Date

7/19/19

Signed


Supervisor

Date

7/19/19

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution
July 19, 2019

CERTIFIED MAIL # 7014 0150 0001 5501 2268
RETURN RECEIPT REQUESTED

Mr. Christopher Waters, Owner
Bulldog Environmental Services LLC
9207 Flint Ave.
Lubbock, Texas 79423

Re: Notice of Enforcement for the Complaint Investigation at:
Bulldog Environmental Services Anton UNA Site, 213 Main St., Anton (Hockley
County), Texas
Customer No.: CN605670983; Regulated Entity No.: RN110797057
Investigation No.: 1577738; Incident No.: 306964

Dear Mr. Waters:

On April 25-May 25, 2019, Mr. Jason Adams and Ms. Sara Coley of the Texas Commission on Environmental Quality (TCEQ) Lubbock Region Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for Industrial and Hazardous Waste and Municipal Solid Waste Programs. During this investigation, certain outstanding alleged violations were documented. Enclosed is a summary which lists the investigation findings and recommended corrective actions. Additional recommended corrective actions may be provided by the Enforcement Division.

In the listing of the alleged violations, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI 032) are located on our agency website at <https://www.tceq.texas.gov> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the Lubbock Region Office at (806) 796-7092 or the Central Office Publications Ordering Team at 512-239-0028. Copies of applicable federal regulations may be obtained by calling Environmental Protection Agency's Publications at 800-490-9198

Also, please be advised that the Legislature has granted enforcement powers to the TCEQ to carry out its mission to protect human health and the environment. Due to the apparent seriousness of the alleged violations, formal enforcement action has been initiated, and additional violations may be cited upon further review. We encourage you to immediately begin taking actions to address the outstanding alleged violations.

In responding with prompt corrective action, the administrative penalty to be assessed may be limited.

The Commission recognizes that the great majority of the regulated community wants to prevent pollution and to comply with environmental laws. We dedicate considerable resources toward making voluntary compliance achievable. But where compliance has not been met it is our duty to protect the public and the environment by enforcing the state's environmental laws, regulations, and permits.

TCEQ Region 2 • 5012 50th St., Ste 100 • Lubbock, Texas 79414-3426 • 806-796-7092 • Fax 806-796-7107

Austin Headquarters: 512-239-1000 • [tceq.texas.gov](https://www.tceq.texas.gov) • How is our customer service? [tceq.texas.gov/customersurvey](https://www.tceq.texas.gov/customersurvey)

Mr. Christopher Waters, Owner
Page 2
July 19, 2019

Also, if you believe the violations documented in this notice has been cited in error, and you have additional information that we are unaware of, you may request a meeting to discuss this enforcement matter. To request a meeting, send a letter describing the additional information to the address shown below.

Waste Section Manager,
Enforcement Division, MC 219
Re: Enforcement Meeting Request
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

If you or members of your staff have any questions, please feel free to contact Mr. Adams in the Lubbock Region Office at (806) 796-7092.

Sincerely,



Jay Keith
Section Manager
Lubbock Region 2 Office
Texas Commission on Environmental Quality

JHK/JWA/ah

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

BULLDOG ENVIRONMENTAL ANTON UNA SITE

213 N MAIN ST
ANTON, HOCKLEY COUNTY, TX 79313

Investigation #

1577738
Investigation Date: 04/25/2019

Additional ID(s): 455020064

OUTSTANDING ALLEGED VIOLATION(S) ASSOCIATED TO A NOTICE OF ENFORCEMENT

Track No: 719928 Compliance Due Date: To Be Determined

30 TAC Chapter 335.2(a)

30 TAC Chapter 335.4

Alleged Violation:

Investigation: 1577738

Comment Date: 07/12/2019

Failure to obtain a permit prior to the storage of industrial and hazardous solid waste or municipal hazardous waste.

Recommended Corrective Action: The RE must remove all hazardous and non-hazardous waste from the unauthorized site and dispose of it at an authorized facility. Documentation of corrective action must be submitted to the TCEQ.

Track No: 719932 Compliance Due Date: To Be Determined

30 TAC Chapter 335.15

Alleged Violation:

Investigation: 1577738

Comment Date: 07/19/2019

Failure to comply with recordkeeping and reporting requirements. Mr. Waters stated that he had no paperwork for the wastes being stored at the RE.

Recommended Corrective Action: The RE must maintain records for all hazardous and non-hazardous waste at the unauthorized site. Documentation of corrective action must be submitted to the TCEQ.

Track No: 719935 Compliance Due Date: To Be Determined

30 TAC Chapter 335.92

Alleged Violation:

Investigation: 1577738

Comment Date: 07/12/2019

Failure to have an EPA identification number and authorization prior to transporting hazardous and Class I waste.

Recommended Corrective Action: The RE must have an EPA identification number and authorization prior to transporting hazardous and Class I waste. Documentation of corrective action must be submitted to the TCEQ.

Track No: 719941 Compliance Due Date: To Be Determined

30 TAC Chapter 335.10

30 TAC Chapter 335.11

Alleged Violation:

Investigation: 1577738

Comment Date: 07/19/2019

Failure to comply with manifesting requirements. Mr. Waters stated that he had no manifests for the wastes being stored at the RE.

Recommended Corrective Action: The RE must comply with manifesting requirements. Documentation of corrective action must be submitted to the TCEQ.

Track No: 719943 **Compliance Due Date:** To Be Determined
30 TAC Chapter 330.15(a)
30 TAC Chapter 330.7(a)

Alleged Violation:

Investigation: 1577738

Comment Date: 07/12/2019

Failure to have an authorization prior to storing solid waste at an unauthorized transfer station.

Recommended Corrective Action: The RE must remove all solid waste from the unauthorized site and dispose of it at an authorized facility. Documentation of corrective action must be submitted to the TCEQ.

Track No: 719955 **Compliance Due Date:** To Be Determined
30 TAC Chapter 330.15(c)
TWC Chapter 26.121

Alleged Violation:

Investigation: 1577738

Comment Date: 07/12/2019

Failure to prevent the discharge of an unknown waste substance onto the ground. The soil was stained and vegetation damaged. There was a strong chemical/acid odor in the immediate areas of the discharge.

Recommended Corrective Action: The RE must clean-up the discharged unknown waste substance from the concrete pad and surrounding soil areas. Documentation of corrective action must be submitted to the TCEQ.

Track No: 719964 **Compliance Due Date:** To Be Determined
30 TAC Chapter 324.4

Alleged Violation:

Investigation: 1577738

Comment Date: 07/19/2019

Failure to obtain a used oil transporter and storage registration prior to conducting such activities.

Recommended Corrective Action: The RE must obtain a used oil transporter and storage registration prior to conducting such activities. All unauthorized storage of used oil must be disposed of or recycled at an authorized disposal/recycling facility. Documentation of corrective action must be submitted to the TCEQ.

TCEQ Complaint Report

07/17/2019
2:03:01PM

Incident No: 306964
Media Type: WASTE
Start Date: Unknown
Received Date: 04/23/2019
Method : PHONE

Staff Member: JAADAMS
Status: Closed
Status Date: 06/28/2019
Priority: Within 5 Working Days

Regulated Entity: BULLDOG ENVIRONMENTAL ANTON UNA SITE

RN110797057

Address: 213 N MAIN ST
ANTON, HOCKLEY County, TX 79313

Physical Location:

Responsible Party: CHRISTOPHER WATERS
Address: 9207 FLINT AVE, LUBBOCK, TX 79423
Work Phone: (432)413-5463

Title:

Number Complaining: 1
Frequency: CURRENT
Alleged Source: BULLDOG ENVIRONMENTAL ANTON
UNA SITE

Program Group: INDUSTRIAL
AND HAZARDOUS WASTE - HIGH
LEVEL
Nature: INDUSTRIAL
Effect: PROPERTY

Initial Problem

On April 23, 2019, the Texas Commission on Environmental Quality (TCEQ) Region 2 Office received an anonymous complaint via telephone. The complainant alleged the improper storage of waste in Hockley County.

Action Taken

This complaint has been assigned and will be further investigated by an Environmental Investigator.

Closure Comments

More information will be available upon approval of the investigation report.

Investigation Number: 1577738

TCEQ PHOTOGRAPHIC DOCUMENTATION

RE Name: Bulldog Environmental Services, UNA Site

Invest. Date: April 25-May 25, 2019

Inv. No.: 1577738

TCEQ ID.: RN110797057

Photographs taken by: Jason Adams



1) UNA Site

Bulldog Environmental Services, the Regulated Entity (RE), building front located 213 Main St., Anton, TX. Note screen door with no locks to secure building.



2) UNA Site

Rear of the RE. No back door and open to the public. Totes, drums, and overpacks can be seen through the back of the building.

TCEQ PHOTOGRAPHIC DOCUMENTATION

RE Name: Bulldog Environmental Services, UNA Site

Invest. Date: April 25-May 25, 2019

Inv. No.: 1577738

TCEQ ID.: RN110797057

Photographs taken by: Jason Adams



3) UNA Site

Looking west at multiple 55 gallon and 30 gallon drums with unknown waste contents. One overpack. Many of the drums are bulging on-top. Drums are not labeled as to their contents. Many drums damaged. Some are missing lids.



4) UNA Site

Looking east at multiple 55 gallon and 30 gallon drums with unknown waste contents. One overpack. Many of the drums are bulging on-top. Drums are not labeled as to their contents. Many drums damaged. Some are missing lids.

TCEQ PHOTOGRAPHIC DOCUMENTATION

RE Name: Bulldog Environmental Services, UNA Site

Invest. Date: April 25-May 25, 2019

Inv. No.: 1577738

TCEQ ID.: RN110797057

Photographs taken by: Jason Adams



5) UNA Site

Looking west at multiple 55 gallon and 30 gallon drums with unknown waste contents. One overpack. Many of the drums are bulging on-top. Drums are not labeled as to their contents. Many drums damaged.



6) UNA Site

One of the drums with an unknown solid waste missing the lid and no labeling.

TCEQ PHOTOGRAPHIC DOCUMENTATION

RE Name: Bulldog Environmental Services, UNA Site

Invest. Date: April 25-May 25, 2019

Inv. No.: 1577738

TCEQ ID.: RN110797057

Photographs taken by: Jason Adams



7) UNA Site

Two of the drums have bulged on both ends. No labeling as to contents. Dried paint was observed around the top of both drums.



8) UNA Site

One drum labeled Methanol. The drum is not empty. Small bung is not completely closed.

TCEQ PHOTOGRAPHIC DOCUMENTATION

RE Name: Bulldog Environmental Services, UNA Site

Invest. Date: April 25-May 25, 2019

Inv. No.: 1577738

TCEQ ID.: RN110797057

Photographs taken by: Jason Adams



9) UNA Site

Looking south at a trailer inside the building with multiple unlabeled drums and overpacks. Drums and overpacks appear to contain an unknown waste substance. One drum is bulging on-top and one the top has rusted out. In the background there are chemical totes some have unknown waste stored inside.



10) UNA Site

One drum on the small trailer in photo #9 with the top corroded away exposing the inside unknown solid waste. It does not appear that the waste in the container is compatible with the waste.

TCEQ PHOTOGRAPHIC DOCUMENTATION

RE Name: Bulldog Environmental Services, UNA Site

Invest. Date: April 25-May 25, 2019

Inv. No.: 1577738

TCEQ ID.: RN110797057

Photographs taken by: Jason Adams



11) UNA Site

Looking south at the chemical totes that have unknown waste substances in some of them. No proper labeling of the contents of the containers was observed.



12) UNA Site

Looking east at six drums with no labeling in front of the chemical totes. Three of the drums are bulging on the top.

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13) UNA Site

Looking east along the south side of the inside of the building. Multiple drums are stored that are bulging. Some are bulging on both ends of the drums. Unknown as to the waste contents. Many drums have dried paint on the tops and sides. No proper labeling was observed.



14) UNA Site

Close-up of one of the drums along the south wall. Drum is bulging. Dried paint was visible on the drum top and sides.

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15) UNA Site

Looking southeast at the chemical totes in the southeast corner of the building.



16) UNA Site

Multiple drums and poly tanks are stored in this area. Unknown as to their waste contents. No proper labeling was observed.

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17) UNA Site

Looking west in the southwest corner of the building. Trailer has multiple unlabeled drums, 5 gallon buckets, overpack and chemical totes. Contents are unknown.



18) UNA Site

Multiple drums are stored in the southwest corner of the building behind the yellow trailer from photo #17. Drums are bulging with no proper labeling as to their current waste contents.

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19) UNA Site

Looking at the small trailer in the northeast corner of the building. It is unknown if the overpacks contain any waste. Drums and overpacks were not labeled.



20) UNA Site

Looking west from the backdoor of the building. Approximately 100 chemical totes were stored in this area. Majority of the totes were empty or only had residue. Multiple totes had unknown waste substances in them. Some of them were full.

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21) UNA Site

Looking south at the concrete pad area and two storage buildings.



22) UNA Site

Looking west at concrete pad. It was observed that a release of an unknown waste substance occurred in this area. There is absorbent spread across the concrete pad and west in the soil on the south side of the storage buildings. It was noted that a strong chemical/acid smell permeated the air in this area.

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23) UNA Site

Looking southwest at concrete pad. It was observed that a release of an unknown waste substance occurred in this area. The release left the pad and ran along the south side of the pad in the soil. Vegetation was damaged in this area. It was noted that a strong chemical/acid smell permeated the air in this area.



24) UNA Site

One of the totes stored on the concrete pad. The tote is labeled corrosive and 55% phosphoric acid.

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25) UNA Site

Looking west at concrete pad. It was observed that a release of an unknown substance occurred in this area. There is absorbent spread across the concrete pad and west in the soil on the south side of the storage buildings. It was noted that a strong chemical/acid smell permeated the air in this area. Water hoses are corroded.



26) UNA Site

Looking east at concrete pad and south side of the storage buildings. It was observed that a release of an unknown substance occurred in this area. There is absorbent spread across the concrete pad and west in the soil on the south side of the storage buildings. It was noted that a strong chemical/acid smell permeated the air in this area. Chemical totes have unknown waste substance in them. Neither tote was closed or labeled as to their contents.

TCEQ PHOTOGRAPHIC DOCUMENTATION

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27) UNA Site

Looking southeast at soil surrounding storage buildings. It was observed that a release of an unknown substance occurred in this area. There is absorbent spread across the soil on the south and west sides of the storage buildings. It was noted that a strong chemical/acid smell permeated the air in this area.



28) UNA Site

Looking east at soil in front of the south storage building. It was observed that a release of an unknown substance occurred in this area. There is absorbent spread across the soil on the south and west sides of the storage buildings. It was noted that a strong chemical/acid smell permeated the air in this area.

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29) UNA Site

Looking northwest at three drums and two chemical totes north of the concrete pad as noted in photos 21-25. Unknown as to the contents of the drums and totes. The west tote has an open top and full of a dark substance with a corrosive label on the side. The east tote is full with an unknown waste substance.



30) UNA Site

East chemical tote as noted in photo #29. Tote is full. Unknown if the waste substance in the tote is what is depicted on the label. The substance appears to be used oil.

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31) UNA Site

West chemical tote as noted in photo #29. Tote is half full. Unknown if the waste substance in tote is what is depicted on the label showing corrosive. The substance appears to be used oil and water.



32) UNA Site

Looking southeast at chemical totes. Unknown if all totes are empty in this area.

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33) UNA Site

Looking south at chemical totes. Unknown if all totes are empty in this area.



34) UNA Site

Looking southeast at chemical tote that is almost full of an unknown waste substance. The tote has leaked onto the ground in this area. The galvanized cylinders contain a liquid and it appears to be algae growing in them.

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35) UNA Site

Looking southeast at galvanized cylinders containing a liquid and appears to be algae growing in them. Unknown if there is a bottom on the cylinders or bare ground.



36) UNA Site

Looking at galvanized cylinder containing a liquid and appears to be algae growing in it. Unknown if there is a bottom on the cylinder or bare ground.

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37) UNA Site

Looking at galvanized cylinder containing a liquid and appears to be algae growing in it. Unknown if there is a bottom on the cylinder or bare ground.



38) UNA Site

Black container that has an oily sheen on the top. The container is not closed or labeled as to the contents.

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39) UNA Site

Looking southwest at chemical totes and drums. Two of the drums have no lids. The one by the blue drum has an unknown waste substance in it. It is not known what is being stored in the other drums and totes.



40) UNA Site

Close-up view of the drums located next to the overpack container that could be seen in photo #39. Unknown if these drums or overpack contain any waste.

TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

Regulated Entity/Site Name	Bulldog Environmental Services Anton UNA Site			TCEQ Add. ID No. RN No (optional)	RN110797057
Investigation Type	Comp.	Contact Made In-House (Y/N)	N	Purpose of Investigation	Complaint
Regulated Entity Contact	Christopher Waters			Telephone No.	(432)413-5463
				FAX #/Email address	cwaters@bulldogenvironmentalservices.com
				Date Contacted	07/17/19
				FAX/Email date	07/17/19

NOTICE: The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and *does not represent final TCEQ findings related to violations*. Any potential or alleged violations discovered after the date on this form will be communicated to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation report.

Issue	For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.		
No.	Type ¹	Rule Citation (if known)	Description of Issue
1	AV	§330.7(a) & 330.15(a)	Failure to have an authorization prior to storing solid waste at an unauthorized transfer station.
2	AV	§330.15(c) & §26.121	Failure to prevent the discharge of an unknown waste substance onto the ground.
3	AV	§335.2(a) & §335.4	Failure to obtain a permit prior to the storage of industrial and hazardous solid waste or municipal hazardous waste.
4	AV	§335.15	Failure to comply with the recordkeeping and reporting requirements.
5	AV	§335.92	Failure to have an EPA identification number and authorization prior to transporting hazardous and Class I waste.
6	AV	§335.10 & §335.11	Failure to comply with manifesting requirements.
7	AV	§324.4	Failure to obtain a used oil transporter and storage registration prior to conducted such activities.

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	X Yes	<input type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	X Yes	<input type="checkbox"/> No

Document Acknowledgment. Signature on this document establishes only that the regulated entity (RE) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, the document will be sent via FAX or Email to RE; therefore, the RE signature is not required.

Investigator Name (Signed & Printed) Jason Adams	Date 07/17/19	Regulated Entity Representative Name (Signed & Printed) E-mailed	Date 07/17/19

If you have questions about any information on this form, please contact your local TCEQ Regional Office.

Please contact the agency's public information officer with any requests, questions, or comments on access to records or information at 512-239-0800.

White Copy: Regulated Entity Representative
TCEQ 20085 (01/2019)

Yellow Copy: TCEQ

(Note: use additional pages as necessary) Page 1 of 1

TEXAS SECRETARY of STATE
JOSE A. ESPARZA**BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY**

Filing Number: 802706436
Original Date of Filing: April 25, 2017
Formation Date: N/A
Tax ID: 32063560737
Duration: Perpetual
Entity Type: Domestic Limited Liability Company (LLC)
Entity Status: In existence
FEIN:
Name: Bulldog Environmental Services LLC
Address: P.O. BOX 357
ANTON, TX 79313 USA

<u>REGISTERED AGENT</u>	<u>FILING HISTORY</u>	<u>NAMES</u>	<u>MANAGEMENT</u>	<u>ASSUMED NAMES</u>	<u>ASSOCIATED ENTITIES</u>
Name		Address		Inactive Date	
Christopher Waters		10105 CR 6900 Lubbock, TX 79407 USA			

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- To place an order for additional information about a filing press the 'Order' button.

TEXAS SECRETARY of STATE
JOSE A. ESPARZA**BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY**

Filing Number: 802706436
Original Date of Filing: April 25, 2017
Formation Date: N/A
Tax ID: 32063560737
Duration: Perpetual
Entity Type: Domestic Limited Liability Company (LLC)
Entity Status: In existence
FEIN:
Name: Bulldog Environmental Services LLC
Address: P.O. BOX 357
ANTON, TX 79313 USA

<u>REGISTERED AGENT</u>	<u>FILING HISTORY</u>	<u>NAMES</u>	<u>MANAGEMENT</u>	<u>ASSUMED NAMES</u>	<u>ASSOCIATED ENTITIES</u>
Last Update	Name	Title	Address		
April 25, 2017	Billie Waters	Managing Member	PO Box 357 Anton, TX 79313 USA		
April 25, 2017	Christopher Waters	Managing Member	PO Box 357 Anton, TX 79313 USA		

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Bulldog Environmental Complaint

Write a description for your map.

Legend

- Anton
- Anton City Hall
- Anton City Water Tower
- Anton Memorial Circle Park
- Bulldog Environmental
- First United Methodist Church
- McCoy Services
- Occupied Building
- Untitled Polygon





Bulldog Environmental Complaint

Write a description for your map.

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